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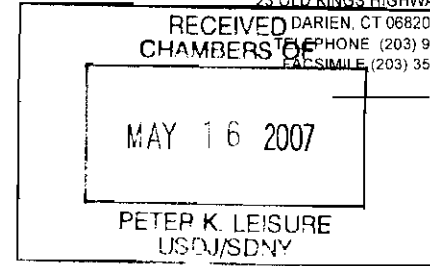
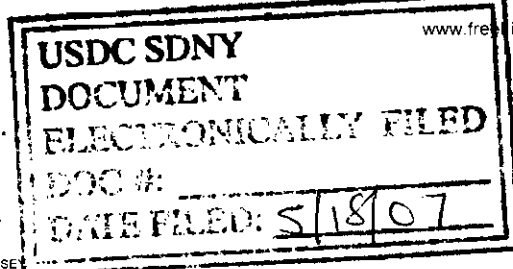
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May 15, 2007

OUR REF: 227-07/DPM/LJK and  
225-07/PJG/PLS

By Hand

The Hon. Peter K. Leisure  
United States District Judge  
Southern District of New York  
United States Courthouse  
500 Pearl Street, Room 1910  
New York, NY 10007

Re: International Alliance v. Source Link  
07 CIV 3525 (PKL)  
MUR Shipping v. Gimpro Negoce  
07 CIV 3501 (PKL)

Dear Judge Leisure:

We represent Plaintiff International Alliance in the matter filed under Docket No. 07 CIV 3525 (PKL) and we also represent Plaintiff MUR Shipping in the matter filed under Docket No. 07 CIV 3501 (PKL) and we write in response to orders received today concerning the preliminary pre-trial conferences scheduled in both matters for July 26, 2007 at 11:00 a.m. For the reasons set forth below, we respectfully request that the portion of the Orders recently received in these two matters that require transmissions to our opponents be rescinded pending the notice required by Local Admiralty Rule B.2. This is our first request for such relief.

These two matters are entirely unrelated. They do have similar basic fact patterns, though. Both matters involve claims for breaches of maritime contracts of charter party, and in both matters, Plaintiffs' Verified Complaints included a request for an attachment pursuant to Supplemental Rule B of the Federal Rules of Civil Procedure. Contemporaneously with the filing of each Verified Complaint, Plaintiffs applied for relief pursuant to Rule B, which was granted in each case *ex parte*. In both cases, Plaintiffs have begun to serve garnishee banks with the writ issued by the Clerk, but in both cases, Plaintiffs are as yet unaware of whether their

The Hon. Peter K. Leisure  
May 15, 2007  
Page 2

respective attempts to restrain property of the respective Defendants have been successful (the garnishees are permitted 20 days to respond under Rule B(3)(a)).

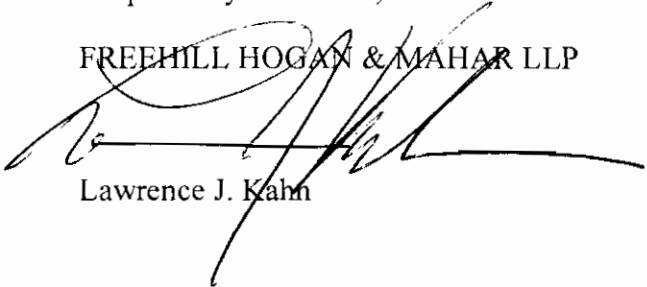
If we were to notify our adversaries of these proceedings now (as required by the Orders in each case) – before any property is known to be restrained – then Defendants would know to attempt to take steps to keep their property outside of this District, which would both defeat the purpose for which the attachments were sought in the first instance and would undermine this Court's Orders directing that the attachments in each case be issued.

The Federal Rules provide, at Local Admiralty Rule B.2, for prompt notice to be given to a defendant of the attachment once property has been restrained, and it is respectfully submitted that the Orders issued in these two matters should be amended to provide that notice to the respective defendants of the preliminary pre-trial conference is to be given along with the Rule B.2 notice in each case.

We thank the Court for its consideration of this request and for its attention to this matter.

Respectfully submitted,

FREEHILL HOGAN & MAHAR LLP

  
Lawrence J. Kahn

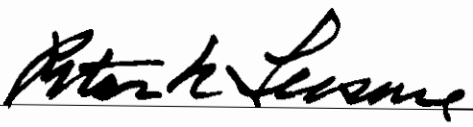
LJK

The orders are amended as requested. Plaintiffs are to give notice of the pre-trial conference to the respective defendants along with the respective Local Admiralty Rule B.2 notices.

**SO ORDERED.**

**New York, New York**

May 17, 2007

  
U.S.D.J.